

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

-against-

ROBERT J. MUELLER, DEEPROOT FUNDS
LLC (a/k/a dprt Funds, LLC), AND POLICY
SERVICES INC.,

Defendants,

-and-

DEEPROOT TECH LLC, DEEPROOT
PINBALL LLC, DEEPROOT STUDIOS LLC,
DEEPROOT SPORTS & ENTERTAINMENT
LLC, DEEPROOT RE 12621 SILICON DR LLC,
AND ROBERT J. MUELLER, JEFFREY L.
MUELLER, AND BELINDA G. BREEN, AS CO-
TRUSTEES OF THE MB HALE OHANA
REVOCABLE TRUST,

Relief Defendants.

Civil Action No.: 5:21-cv-785-XR

**DEFENDANT ROBERT J. MUELLER'S UNOPPOSED MOTION TO
SUBSTITUTE COUNSEL**

TO THE HONORABLE COURT:

Defendant Robert J. Mueller ("**Mr. Mueller**") respectfully requests that H. Jay Hulings of DAVIS & SANTOS, PLLC be permitted to withdraw as counsel for Mr. Mueller, and that Caroline Newman Small be substituted as counsel for Mr. Mueller. Mr. Hulings no longer practices law with DAVIS & SANTOS, PLLC. Jason M. Davis will continue as lead counsel for Mueller.

Mr. Mueller requests that the Clerk of Court and the parties update their records with Ms. Small's identifying and contact information as follows:

Caroline Newman Small
State Bar No. 24056037
E-mail: csmall@dslawpc.com
DAVIS & SANTOS, PLLC
719 S. Flores Street
San Antonio Texas 78204
Tel: (210) 853-5882
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Mr. Mueller, through his representatives, approves and agrees to this substitution.

This Motion to Substitute Counsel is not sought for purposes of delay, but so that justice may be done.

Mr. Mueller requests that all future pleadings and correspondence in this case be sent to Mr. Jason M. Davis and Ms. Caroline Newman Small at the address provided above.

For these reasons, Mueller respectfully requests that the Court permit H. Jay Hulings of DAVIS & SANTOS, PLLC to withdraw from this case and substitute Caroline Newman Small of DAVIS & SANTOS, PLLC as attorney for Defendant Robert J. Mueller.

Dated: August 25, 2023

Respectfully submitted,

DAVIS & SANTOS, PLLC

By: /s/ Caroline Newman Small

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*Attorneys for Defendant
Robert J. Mueller*

CERTIFICATE OF CONFERENCE

I certify that on the 25th day of August 2023, counsel for Defendant Robert J. Mueller conferred with Fernando Campoamor, counsel for Securities and Exchange Commission, and confirmed that this Motion is unopposed.

/s/ Caroline Newman Small
Caroline Newman Small

CERTIFICATE OF SERVICE

I certify that on the 25th day of August 2023, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system and all counsel of record will receive an electronic copy via the Court's CM/ECF system.

/s/ Caroline Newman Small
Caroline Newman Small